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9 Attorneys for Defendants
10 JOSEPH R. MATEL, M.D.
11 and RICHARD FLINDERS, M.D.

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13
14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 VALERIE GEORGE, et. al.,

17 No. C-08-02675 EDL

18 Plaintiffs,

STIPULATION AND
[PROPOSED] ORDER
AS MODIFIED

19 vs.

Requested Hearing Date: 08-10-2010

20 SONOMA COUNTY SHERIFF'S
21 DEPARTMENT, et. al.,

Honorable Elizabeth D. Laporte

22 Defendants.

Third Amended Complaint Filed:
February 24, 2009

23 Jury Trial Date: January 24, 2011

24
25 Defendants Joseph R. Matel, M.D. and Richard Flinders, M.D. intend to submit
26 a motion for determination of good faith settlement. IT IS HEREBY STIPULATED AND
27 AGREED, by and between the undersigned counsel, pursuant to Local Rule 6-1(b), that,
28 subject to the Court's approval, that the motion for determination of good faith settlement to
be brought by defendants Joseph R. Matel, M.D. and Richard Flinders, M.D. may be heard on
shortened time. The reason the parties request the shortened time for the motion is that
discovery and dispositive motion deadlines are imminent. Also, the minor's compromise was
only recently approved by the Court.

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1 The parties further agree to the following briefing schedule:

2 Motion due: July 27, 2010.

3 Opposition due: August 3, 2010.

4 Reply due: August 6, 2010.

5 Hearing Date: Tuesday, August 10, 2010, at 2:00 p.m.

6

7 Dated: July 23, 2010

HASSARD BONNINGTON LLP

8 */ S / Joanna L. Storey*

9 **Joanna L. Storey**

10 Attorneys for Defendants

11 JOSEPH R. MATEL, M.D. and RICHARD
FLINDERS, M.D.

12 Dated: July 23, 2010

SANFORD WITTELS & HEISLER LLP

13 */ S / (as authorized on 07/23/2010)*

14 **Steven Wittels**

15 Attorneys for Plaintiffs

16 VALERIE GEORGE, DONALD GEORGE,
JAIDA GEORGE, and
RYAN GEORGE, JR.

17

18 Dated: July 23, 2010

SPAULDING, MCCULLOUGH & TANSIL LLP

19 */ S / (as authorized on 07/23/2010)*

20 **Terry S. Sterling**

21 Attorneys for Defendants

22 SONOMA COUNTY SHERIFF'S
DEPARTMENT, BILL COGBILL AND
COUNTY OF SONOMA

23

24 Dated: July 23, 2010

TRIMBLE SHERINIAN & VARANINI

25 */ S / (as authorized on 07/22/2010)*

26 **Jerome M. Varanini**

27 Attorneys for Defendants

28 CALIFORNIA FORENSIC MEDICAL
GROUP, INC., MICHAEL E. DAGEY, R.N.,
JAMES LUDERS, M.D.

1 Dated: July 23, 2010

LAFOLLETTE JOHNSON DEHAAS

2 / S / (as authorized on 07/23/2010)

3 **Larry Byron Thornton**
4 Attorneys for Defendants
5 SUTTER HEALTH AND SUTTER
6 MEDICAL CENTER OF SANTA ROSA

7 Dated: July 23, 2010

ROGASKI, PREOVOLOS, WEBER & PATTERSON

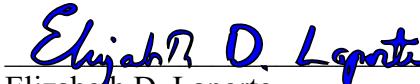
8 / S / (as authorized on 07/23/2010)

9 **Ralph Andino**
10 Attorneys for Defendants
11 NORICK JANIAN, M.D.

12 GOOD CAUSE APPEARING THEREFOR, IT IS HEREBY ORDERED that
13 the motion for determination of good faith settlement by defendants Joseph R. Matel, M.D.
14 and Richard Flinders, M.D. shall be heard on shortened time with the following briefing
15 schedule:

16 Motion due: July 27, 2010.
17 noon on August 2
18 Opposition due: ~~August 3, 2010.~~
19 Reply due: ~~August 3~~
20 Hearing Date: ~~August 6, 2010.~~
21 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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22 Dated: July 26, 2010

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24 Elizabeth D. Laporte
25 United States Magistrate Judge
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